

EXHIBIT A

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

TRAVELODGE HOTELS, INC.,)	CASE NO. 1:01-CV-00784
)	
Plaintiff,)	JUDGE WEBER
)	MAGISTRATE JUDGE TIMOTHY S. BLACK
v.)	
)	
GOPAL GOVAN,)	
)	<u>SECOND AFFIDAVIT OF STEVEN A.</u>
Defendant/Third-Party)	<u>GOLDFARB</u>
Plaintiff,)	
v.)	
)	
CINCINNATI TRAVELODGE,)	
)	
Third-Party Defendant.)	
STATE OF OHIO)	
)	SS.
COUNTY OF CUYAHOGA)	

Steven A. Goldfarb, being first duly sworn, deposes and says as follows:

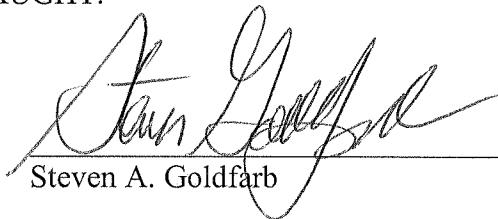
1. I am a partner with the law firm of Hahn Loeser & Parks LLP ("Hahn Loeser") and have personal knowledge of all matters stated herein.
2. I submit this Affidavit in further support of Travelodge Hotels Inc.'s ("THI") Motion To Supplement Judgment With Attorneys' Fees and Costs Incurred On Appeal ("Motion to Supplement").
3. THI's counsels' hourly rates vary on certain invoices attached to the Motion to Supplement because those invoices reflect substantially discounted rates for instances in which Hahn Loeser and Parks, LLP ("Hahn Loeser") did not bill THI for hours that I believed exceeded a reasonable amount of time for the work performed.

4. When a client invoice is discounted in this manner, Hahn Loeser's accounting system does not reduce the number of hours worked; but rather reflects the discount by making a global reduction of the rates of all timekeepers on that invoice. To the extent discounts are provided on multiple invoices, the "net rate" can vary, but the usual hourly rate does not.

5. The Motion to Supplement only includes charges for the hourly rates actually billed to THI, which rates are substantially discounted on certain invoices.


6. THI incurred \$775.75 in connection with title searches performed on real property owned by Govan in various states in an effort to collect on THI's judgment against Govan—which has still not been satisfied.

FURTHER AFFIANT SAYETH NAUGHT.



Steven A. Goldfarb

SWORN TO BEFORE ME and subscribed in my presence this 3rd day of
February 2006.



Notary Public

ERICA CALDERAS, Attorney At Law
Notary Public - State of Ohio
My commission has no expiration date.
Section 147.03 O. R. C.